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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Ray L. Flores II,

Plaintiff,

v.

Robert F. Kennedy, Jr., as Secretary of the
Department of Health and Human Services,

Defendant.

Case No. 2:25-cv-00916-JAD-NJK

**Stipulation to Extend Time for United
States to Respond to Plaintiff's
Complaint (First Request)**

Pursuant to Local Rule IA 6-1, Defendant Robert F. Kennedy, Jr., in his official capacity as Secretary of the Department of Health and Human Services ("Secretary" or "Defendant") requests a 14-day extension to file its answer or otherwise respond to Plaintiff's Complaint (ECF No. 1).

This matter is a declaratory relief action alleging violations of the National Childhood Vaccine Injury Act of 1986. Defendant was served with the Summons and Complaint on June 2, 2025. Under Fed. R. Civ. P 12(a)(2), Defendant must answer or otherwise respond to Plaintiff's Complaint by August 1, 2025.

Defendant respectfully requests additional time to respond to the Complaint in order to allow the parties an opportunity to explore the potential for early resolution of this matter before engaging in further litigation. Counsel for Defendant has conferred with Plaintiff, and the parties have agreed to a fourteen (14) day extension of Defendant's

1 deadline to answer or otherwise respond to the Complaint, through and including August
2 15, 2025.

3 Accordingly, Defendant respectfully requests the Court grant this stipulation and
4 extend the time for Defendant to answer or otherwise respond by 14 days, or by **August 15,**
5 **2025.**

6 Respectfully submitted this 25th day of July 2025.

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8 Dated this 24 day of July 2025.

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10 /s/ Ray L. Flores II,
11 Plaintiff in Pro Per

8 Dated this 25th day of July 2025.

9 SIGAL CHATTAH
United States Attorney

10 /s/ Summer A. Johnson
11 SUMMER A. JOHNSON
12 Assistant United States Attorney
13 501 Las Vegas Blvd. So., Suite 1100
14 Las Vegas, Nevada 89101
15 Attorney for Defendant

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17 **IT IS SO ORDERED:**

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20 ~~UNITED STATES DISTRICT JUDGE~~
21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** July 28, 2025
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